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via email to: splimpto@nsf.gov

Suzanne H Plimpton
Reports Clearance Officer
National Science Foundation
4201 Wilson Boulevard, Suite 295
Arlington VA 22230

SUBJECT: (78 FR 3453) Notice of Intent to Seek Approval to Establish an Information Collection System – Grantee Reporting Requirements for the Emerging Frontiers in Research and Innovation Program

Dear Ms. Plimpton:

The University of Kentucky is a public land-grant university and the Commonwealth's flagship research institution. It is also, through the University of Kentucky Research Foundation, a recipient of an NSF Emerging Frontiers in Research and Innovation (EFRI) award. I write to register our strong objection to the proposal to establish an information collection system requiring EFRI grantees to provide NSF with reports of research outcomes for five years beyond the end of the award.

We applaud NSF's vision in creating EFRI as a program designed to support multi-disciplinary research teams conducting "cutting-edge research that is difficult to fund through other NSF programs." But we disagree that the need for program assessment warrants imposing new and burdensome reporting requirements. Instead, EFRI program staff should find creative ways to accomplish their goal within the "standard reporting requirements used by NSF."

The proposed information collection will be burdensome on principal investigators, who are already burdened with administrative requirements. The Federal Demonstration Partnership's recent national survey of faculty workload (http://sites.nationalacademies.org/PGA/fdp/PGA_081164) showed that principal investigators spend 42% of their federal research time completing administrative requirements. Indeed, the National Science Board has convened a Task Force on Administrative Burden to examine the administrative burden imposed on federally supported researchers and to offer recommendations for relieving the administrative workload. The NSF should not be adding further to this burden.

The proposed information collection will be burdensome on grantee institutions. Our central information technology system is designed to comply with current federal regulations promulgated at 2 CFR Part 215 that require grantees to retain records for three years after the final financial and technical reports are submitted. That system includes automatic records destruction after the required retention period ends. For this University to respond to the proposed information collection, we would either have to reprogram the central information technology system or maintain EFRI program records manually outside the computer system. Either approach would be administratively burdensome and costly. The University's administrative costs already exceed the 26% cap imposed by Office of Management and Budget (OMB) Circular A-21. Thus, the proposed information collection would amount to one more unfunded mandate on the academic research community.

The University of Kentucky concurs with the opinion expressed by the Council on Governmental Relations that the proposed information collection system is not critical to the effective management of the EFRI program by NSF. The resulting burdens on both the principal investigator and grantee administration "in terms of time, costs, and logistics outweigh the anticipated benefits."

Thank you for considering our comments.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'James W. Tracy', with a stylized, flowing script.

James W. Tracy, PhD
Vice President for Research
Professor, Department of Molecular & Cellular Biochemistry
Executive Director, University of Kentucky Research Foundation